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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re PARMALAT SECURITIES LITIGATION,

This document relates to: 07 Civ. 03790

JOHN HANCOCK LIFE INSURANCE COMPANY, JOHN HANCOCK VARIABLE LIFE INSURANCE COMPANY, and JOHN HANCOCK INSURANCE COMPANY OF VERMONT,

Plaintiffs.

VS.

BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., and BANC OF AMERICA SECURITIES LLC,

Defendants.

JOINT STIPULATION ON A LIMITED EXTENSION OF THE FACT DISCOVERY PERIOD

> USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #:

This Amended Joint Stipulation applies only to the above-captioned action, which was consolidated in the In Re Parmalat MDL proceeding on May 17, 2007.

- 1. The purpose of this Stipulation is to establish a reasonable time period within which the parties may complete fact discovery.
- 2. The parties request the Court's approval of a brief extension of the fact discovery period. The fact discovery cutoff previously stipulated to by the parties and submitted to this Court for its approval was September 21, 2007. The parties have agreed that a brief extension is necessary, and thus would like to extend the cutoff to October 25, 2007, with respect to depositions only. Within such time period, the parties shall complete all fact-witness depositions

pursuant to the Federal Rules of Civil Procedure. This stipulation regarding the extension of the cutoff does not restrict the parties from objecting to specific deposition requests.

3. Prior to the new October 25, 2007 discovery cutoff date, the parties shall consult with one another and make application to the Court, jointly or separately, to set reasonable deadlines for the exchange of expert reports, the completion of expert discovery, and the filing of dispositive motions, if any.

September 12, 2007

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